



F I S H E R | T A U B E N F E L D L L P

225 Broadway, Suite 1700  
New York, New York 10007  
Main 212.571.0700  
Fax 212.505.2001  
www.fishertaubenfeld.com

Writer's direct dial: (212) 384-0258  
Writer's email: michael@fishertaubenfeld.com

April 18, 2025

**VIA ECF**

The Honorable Katharine H. Parker, U.S.M.J.  
U.S. District Court, Southern District of New York  
500 Pearl St.  
New York, NY 10007

**APPLICATION GRANTED**

*Katharine H. Parker*  
\_\_\_\_\_  
**Hon. Katharine H. Parker, U.S.M.J.**

4/21/2025

Re: Rene v. 31 East 21 Express Inc. et al.  
Case No.: 21-cv-7435 (JGK) (KHP)

Dear Judge Parker:

We represent Plaintiff in this action. On April 14, the Court granted Plaintiff an extension to file his motion for damages after default until April 18.

We write to respectfully request a one-week extension of Plaintiff's deadline to file from April 18 to April 25, 2025, and a corresponding extension of Defendants' response deadline to May 9, 2025.

Due to the undersigned's availability this past week due to the Passover holiday, which was more limited than originally expected, we need additional time to finalize the filing. We do not anticipate any further requests.

Thank you for your consideration of the above.

Respectfully Submitted,

\_\_\_\_\_  
\_\_\_\_\_  
/s/  
Michael Taubenfeld